

**REMARKS**

Claims 1-16 and 18-22 were presented for examination and all claims were rejected. Applicant submits this Amendment and Response with a Request for Continued Examination following the filing of a Notice of Appeal. In the current amendment, claims 1, 2, 4, 6, 8, 10, 11 and 14-16 are amended. Claims 3, 5, 7, 9, and 13 are cancelled. No new matter has been introduced. Upon entry of the current amendment, claims 1, 2, 4, 6, 8, 10-12, 14-16 and 18-22 will be presented for further examination, of which claims 1 and 14 are independent. Applicants submit that the claims are patentable and in condition for allowance.

The following comments address all stated grounds of rejection. Applicants respectfully traverse all rejections and urge the Examiner to pass the claims to allowance in view of the remarks set forth below.

**CLAIM REJECTIONS UNDER 35 U.S.C. §103****I.     Claims 1-16 and 18-22 Rejected under 35 USC §103(a)**

Claims 1-5 and 8-13 were rejected as unpatentable over U.S. Patent No. 7,203,941 to Demsey et al. (“Demsey”) in view of U.S. Patent No. 4,253,145 to Goldberg (“Goldberg”). Claims 6-7, 14-16 and 18-22 were rejected as unpatentable over Demsey in view of Goldberg and in further view of U.S. Patent No. 7,206,819 to Schmidt (“Schmidt”). Claims 3, 5, 7, 9 and 13 are cancelled, mooting this rejection with respect to those claims. Independent claims 1 and 14 are hereby amended. Claims 2, 4, 6, 8, and 10-12 depend on claim 1 and claims 15-16 and 18-22 depend on and incorporate all of the patentable subject matter of independent claim 14. Applicant respectfully traverses the rejection of claims 1, 2, 4, 6, 8, 10-12, 16, and 18-22 to the extent it they are maintained over the claims as amended.

The arguments previously made with respect to the patentability of the claims are reiterated here as if set forth in full. In short, Applicant respectfully submits that none of the cited references teach an isolation environment comprising a user isolation layer and an application isolation layer, as explicitly recited by the claims. However, in order to expedite prosecution, Applicant offers the following further remarks regarding the current amendments to the claims.

A. Independent Claims 1 and 14 Patentable over Demsey, Goldberg, and Schmidt

To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. Claims 1 and 14 are directed towards a method and apparatus, respectively, for virtualizing access to native resources. The claims recite:

- receiving a request to access a first native resource provided by an operating system
- determining that a rule action specifying redirection is associated with the virtual name included in the received request;
- forming a literal name responsive to the rule action and the virtual name, the literal name identifying a second native resource having the same type as the requested resource; and
- issuing to the operating system a request to access the second native resource, the request including the formed literal name.

Neither Demsey, Goldberg, nor Schmidt teach or suggest responding to a request for a first native resource with a second native resource that is identified by a rule action applied to the virtual name used to identify the first native resource.

Demsey, for example, explicitly teaches that native resources are shared by processes, not isolated (see Demsey, col. 7, lines 33-36). Demsey is merely describing a tracking system for resource handles for the purpose of reallocating resources to applications and performing garbage collection routines (see Demsey, col. 2, lines 19-23 and Summary). Therefore, Demsey neither teaches nor suggests forming a literal name for a requested native resource responsive to a rule action and the virtual name included in the request, the literal name identifying a second native resource having the same type as the requested resource.

The Examiner cites Goldberg for the purpose of describing mapping a virtual resource name to a real resource name (see Office Action, page 7, para. 1). Goldberg describes a system for mapping virtual resources of a virtual machine to native resources of a physical machine, not redirecting a request for a first native resource so that a second, different native resource is accessed. As with Demsey, the reference neither teaches nor suggests forming a literal name for a requested native resource responsive to a rule action and the virtual name included in the

request, the literal name identifying a second native resource having the same type as the requested resource.

The Examiner cites Schmidt for the purpose of describing a virtual namespace to access a registry key (see Office Action, page 12, para. 1). Schmidt describes a virtual namespace that remaps resource locations. However, Schmidt's "underlying file system is globally available" (see Schmidt, col. 5, lines 63-64), and "capsules may export portions of their view to other capsules to support data sharing." (see Schmidt, col. 6, lines 11-12). Schmidt, therefore, also does not teach or suggest redirecting a request for a first native resource so that a second, different native resource is accessed. As with Demsey and Goldberg, the reference neither teaches nor suggests forming a literal name for a requested native resource responsive to a rule action and the virtual name included in the request, the literal name identifying a second native resource having the same type as the requested resource.

Because Demsey, Goldberg, and Schmidt, alone or in combination, fail to teach or suggest each and every element of the claimed invention, Applicant requests the Examiner to withdraw the rejection of claims 1, 2, 4, 6, 8, 10-12, 14-16 and 18-22 under 35 U.S.C. §103.

**CONCLUSION**

In light of the aforementioned arguments, Applicants contend that each of the Examiner's rejections has been adequately addressed and all of the pending claims are in condition for allowance. Accordingly, Applicants respectfully request reconsideration, withdrawal of all grounds of rejection, and allowance of all of the pending claims.

Should the Examiner feel that a telephone conference with Applicants' attorney would expedite prosecution of this application, the Examiner is urged to contact the Applicants' attorney at the telephone number identified below.

Respectfully submitted,  
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